AFFIDAVIT IN SUPPORT OF APPLICATION FOR CRIMINAL COMPLAINT INTRODUCTION

- I, Desirae Maldonado, being duly sworn, hereby depose and state:
- of Investigation (FBI). I have been employed by the FBI as a Special Agent since January 2019. As such, I am an "investigative or law enforcement officer" of the United States within the meaning of 18 U.S.C. § 2510(7), that is, I am an officer of the United States, who is empowered by law to conduct investigations regarding violations of United States law, to execute warrants issued under the authority of the United States, and to make arrests of the offenses enumerated in 18 U.S.C. §§ 2251 et. seq. In the course of my duties, I am responsible for investigating crimes which include, but are not limited to, child exploitation and child pornography. I have previously been involved in criminal investigations concerning violations of federal laws. Since joining the FBI, I have received specialized training in human trafficking investigations, identifying and seizing electronic evidence, computer forensics, recovery, and social media investigations.
- 2. This affidavit supports an application for a criminal complaint charging DONOVAN CHAPLIN with Coercion and Enticement of a Minor, in violation of Title 18, United States Code, § 2422(b) and Production of Child Pornography, in violation of Title 18, United States Code, § 2251(a).
- 3. The information set forth in this affidavit is known to me as a result of an investigation personally conducted by me and other law enforcement agents. Thus, the statements in this affidavit are based in part on information provided to Special Agents ("SAs") and other employees of the FBI, as well as other investigators employed by federal or state governments. I

have participated in investigations involving persons who collect and distribute child pornography, and the importation and distribution of materials relating to the sexual exploitation of children. I have received training in the areas of child exploitation, and I have reviewed images and videos of child pornography in a wide variety of media forms, including computer media. I have also discussed and reviewed these materials with other law enforcement officers.

- 4. In the course of my employment as a sworn law enforcement officer, I have participated in the execution of numerous search warrants resulting in the seizure of computers, magnetic storage media for computers, other electronic media, and other items evidencing violations of state and federal laws, including various sections of Title 18, United States Code § 2251 et. seq. involving child exploitation offenses.
- 5. This affidavit is based upon information that I have gained from my investigation, my training and experience, as well as information gained from conversations with other law enforcement officers. Since this affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that DONOVAN CHAPLIN, has committed a violation of Title 18, United States Code Sections 2422(b) and 2251(a).

STATUTORY AUTHORITY

6. This investigation concerns alleged violations of Title 18, United States Code, § 2422(b), relating to material involving the coercion and enticement of a minor, and Title 18, United States Code, § 2251(a), relating to the production of child pornography.

- 7. Title 18 United States Code § 2422(b) provides that whoever, using the mail or any facility or means of interstate or foreign commerce, or within the special maritime and territorial jurisdiction of the United States knowingly persuades, induces, entices, or coerces any individual who has not attained the age of 18 years, to engage in prostitution, or in any sexual activity for which any person can be charged with a criminal offense, or attempts to do so, shall be fined under this title or imprisoned not less than 10 years or for life.
- 8. As relevant here, Virginia Code § 18.2-374.3 prohibits soliciting minors using communications systems including computers.
- 9. Title 18 United States Code §2251(a) provides that any person who employs, uses, persuades, induces, entices, or coerces, or attempts to do so, any minor to engage in, or who has a minor assist any other person to engage in, or who transports any minor in or affecting interstate or foreign commerce, or in any Territory or Possession of the United States, with the intent that such minor engage in, any sexually explicit conduct for the purpose of producing any visual depiction of such conduct or for the purpose of transmitting a live visual depiction of such conduct, shall be punished as provided under subsection (e), if such person knows or has reason to know that such visual depiction will be transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce or mailed, if that visual depiction was produced or transmitted using materials that have been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer, or if such visual depiction has actually been transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce or mailed.

DEFINITIONS

- 10. The terms "minor" and "sexually explicit conduct" are defined in Title 18, United States Code, §§ 2256(1) and (2). The term "minor" is defined as "any person under the age of eighteen years." The term "sexually explicit conduct" means actual or simulated:
 - a. Sexual intercourse, including genital-genital, oral-genital, anal-genital, or oral-anal, whether between persons of the same or opposite sex;
 - b. Bestiality;
 - c. Masturbation;
 - d. Sadistic or masochistic abuse; or
 - e. Lascivious exhibition of the anus, genitals or pubic area of any person.
- 11. The term "computer," as used herein, is defined pursuant to Title 18, United States Code, § 1030(e)(1), as "an electronic, magnetic, optical, electrochemical, or other high speed data processing device performing logical or storage functions, and includes any data storage facility or communications facility directly related to or operating in conjunction with such device."

FACTS AND CIRCIMSTANCES

- 12. On January 17, 2023, the FBI Norfolk Office/Peninsula Resident Agency received information from a complainant indicating Jane Doe 1, a 15-year-old girl residing in Franklin, Virginia, had been communicating with Discord username "eric101#8073" for approximately two months on Discord. Discord username "eric101#8073" claimed he was 17 years old and solicited and exchanged sexually explicit communications and photos with Jane Doe 1.
- 13. On January 24, 2023, Discord responded to an administrative subpoena requesting subscriber information for Discord username "eric101#8073" issued on January 20, 2023. The

response included the following subscriber information: Username: eric101#8073; User ID: 1039643643977400000, Billing name: Eric Reddington, email: reddingtoner1@gmail.com, Phone number: +1716***3754, Registration IP address: 72.228.148.122, last seen IP address: 72.228.148.122 (2023-1-24 20:53:25). The listed billing address was in Iowa Park, Texas.

- 14. On January 27, 2023, your affiant queried the National Center for Missing and Exploited Children (NCMEC) for potential CyberTips associated with IP address: 72.228.148.122. The query resulted in two CyberTips: 139400241 and 81905894. Both CyberTips were associated with the New York State Police Department and worked by the New York State Internet Crimes Against Children Task Force (ICAC).
- 15. On January 27, 2023, your affiant contacted the New York ICAC regarding CyberTips 139400241 and 81905894. New York ICAC advised your affiant CyberTip 139400241 was closed as there were no images associated with the CyberTip. New York ICAC advised your affiant CyberTip 81905894 led to the arrest of DONOVAN CHAPLIN, date of birth: 09/**/2000, address: *** Monroe Avenue, Angola, New York 14006.
- 16. On January 5, 2022, DONOVAN CHAPLIN was convicted of a Class D felony Sexual Abuse 1st: Sexual Contact with an Individual Less than 11 Years Old in Erie County, New York. DONOVAN CHAPLIN was sentenced on April 11, 2022, to 10 years of probation.
- 17. On February 1, 2023, Charter Communications responded to an administrative subpoena requesting subscriber information for IP address: 72.228.148.122 issued on January 25, 2023. The response included the following subscriber information: Subscriber name: Chris Chaplin, Service/Billing Address: *** Monroe Avenue, Apartment *, Angola, New York 14006, Start date: 4/2/2019 9:38PM.

- 18. Open-source queries reveal Christopher L. Chaplin, date of birth: **/**/1959, resides at *** Monroe Avenue, Angola, New York 14006. Open-source queries also reveal DONOVAN J. CHAPLIN, date of birth: 09/**/2000, also resides at *** Monroe Avenue, Angola, New York 14006.
- 19. On March 8, 2023, your affiant received a 256GB USB from Jane Doe 1's stepmother containing a screen recording of the conversation between Jane Doe 1 and Discord username "eric101#8073." The screen recording was approximately 6 hours and 4 minutes in length.
- 20. On May 8, 2023, your affiant completed the review of the aforementioned screen recording. During the review of the screen recording, the following conversations occurred, but do not encompass the entirety of the conversation between approximately November 12, 2022, and January 25, 2023:
 - a. 11/12/2022 8:18PM

eric101#8073: you said youre 15?

Jane Doe 1: Yea eric101#8073: cool

b. 11/13/2022 5:29PM

eric101#8073: lol how old are you again

Jane Doe 1: 15

eric101#8073: ok yeah I remember

Jane Doe 1: Lol

Jane Doe 1: Aren't you like 17? eric101#8073: ya that ok?

Jane Doe 1: Yeah

ſ...]

eric101#8073: I guess...sucks your not freaky cause youre beautiful

Jane Doe 1: Ah. eric101#8073: va...

Jane Doe 1: Yea, but not everything has to be sexual

eric101#8073: I get that ya do you think you might be a lil freaky if we keep talking

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Jane Doe 1: I don't know
eric101#8073: Do you think you might ever take a pic...?
Jane Doe 1: I won't bc I'm playing on my brother's device
eric101#8073: Oh vou wouldn't be able to take one and delete it?
Jane Doe 1: I got this.
Jane Doe 1: [Sends picture of her body fully clothed]
eric101#8073: damnnnnn
eric101#8073: I wouldn't mind those pants off hehe
eric101#8073: are you with people rn
Jane Doe 1: Yes
eric101#8073: damn are you ever able to get alone?
Jane Doe 1: No
Jane Doe 1: Lol my mom has a small house
eric101#8073: when do you touch yourself>?
Jane Doe 1: When I get horny
eric101#8073: where do you go to do it?
Jane Doe 1: The bathroom or when my sister isn't in the room
eric101#8073: damn and you never have the device wit you
Jane Doe 1: No
[...]
Jane Doe 1: I'm still a Virgin lmao
eric101#8073: id change that
Jane Doe 1: You are also 2 years older.
eric101#8073: so?
eric101#8073: im also experienced and ill make you cum
Jane Doe 1: Ah.
Jane Doe 1: No.
[...]
eric101#8073: do you cumm when you touch yourself
Jane Doe 1: Sometimes.
eric101#8073: now imagine instead of you fingers it being my tongue
Jane Doe 1: Oh.
eric101#8073: fuck thinking about you having your panties on my floor and
your legs spread on my bed and me eating you out till you cum makes me hard
Jane Doe 1: Oh cool
eric101#8073: lol
Jane Doe 1: Glad I can pleasure you without taling sexual
eric101#8073: without what
Jane Doe 1: Talking*
eric101#8073: ohhh you should try for me...
Jane Doe 1: I cannot
Jane Doe 1: I'm rusty...
eric101#8073: I don't mind
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eric101#8073: please

Jane Doe 1: No

Jane Doe 1: I don't want to Jane Doe 1: Go masterbate eric101#8073: aw man

eric101#8073: id rather you jerk me off

 $[\ldots]$

eric101#8073: mhmm id eat the fuck outta you hehe

Jane Doe 1: O

eric101#8073: your cum on my chin would be hot

Jane Doe 1: *I.*Jane Doe 1: *No*.

eric101#8073: no what?

Jane Doe 1: I'm still younger than you.

eric101#8073: only a couple years its not bad at all

c. 11/18/2022 8:35PM

eric101#8073: can I see boobies lol

Jane Doe 1: [sends picture of herself in bra with hand between chest]

eric101#8073: move that hand princess

eric101#8073: please babygirl

eric101#8073: or would you be willing to show me that ass without those shorts

d. 11/27/2022 7:06PM

eric101#8073: can I send a dick pic Jane Doe 1: You can send pics?

eric101#8073: I have one but no face pics

Jane Doe 1: 0

eric101#8073: do you want the dick pic

Jane Doe 1: I mean you can if you're comfortable. I gotta leave soon.

eric101#8073: youre gonna be scared

Jane Doe 1: Oh

eric101#8073: [sends picture of an erect penis with a ruler next to it]

eric101#8073: I wanna rip you open

e. 12/20/2022 9:26PM

eric101#8073: letting me see you naked so I can fuck you till you cum

Jane Doe 1: That seems as it'll help you

eric101#8073: itll help us both

eric101#8073: I wont save I swear just lemme see a quick pic

Jane Doe 1: idk

Jane Doe 1: I'll try something *emoji*

eric101#8073: please I swear I wont expose I don't even answer peoples calls

eric101#8073: and I don't save

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Jane Doe 1: [sends picture exposing breasts]
   eric101#8073: oh fuck vess
   eric101#8073: lemme fucking suck them amazing boobs
   eric101#8073: fuckkkkk
   eric101#8073: please give me everything
   eric101#8073: I want all of your sexiness
   Jane Doe 1: I meant That's all u get *emoji*
   eric101#8073: please give me
   Jane Doe 1: Auto correct got me wrong
   eric101#8073: take off pants at least
   Jane Doe 1: [sends picture standing with t-shirt and backside of underwear]
   eric101#8073: oh fuck yessssss you really should give me one pic of that kitty
   that will be drizzling my cum out of it
f. 12/24/2022 4:01PM
   Jane Doe 1: Wyd?
   eric101#8073: freezing
   Jane Doe 1: Oh are you outside
   eric101#8073: nope
   Jane Doe 1: You're freezing inside?
   eric101#8073: mhmm
   eric101#8073: im currently at my unless in buffalo NY
   Jane Doe 1: OH
   eric101#8073: it's a fucking blizzard here
g. 12/29/2022 1:46PM
   Jane Doe 1: Btw I just got out the shower and realized how ugly my pussy looks
   *emoji*
   eric101#8073: Proof?
   eric101#8073: Proof
   eric101#8073: Proof
   eric101#8073: Proof
   eric101#8073: cause I don't believe you
   Jane Doe 1: Umn
   eric101#8073: hehehe
   Jane Doe 1: Imma delete this later, butvwhy does it look like that *emoji*
   Jane Doe 1: [Sends picture of vagina while sitting on blue towel]
   eric101#8073: ooooo*emoji*
   eric101#8073: mmmmmm
   eric101#8073: daddy wantssssssssssssssssssssss
   eric101#8073: hehehehe
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Jane Doe 1: *emoji* wow.

eric101#8073: I knew you were lying

eric101#8073: that pussy looks so fucking tasty

h. 1/7/2023 6:22PM

Jane Doe 1: That's like two first names

Jane Doe 1: Sophie Lee? Jane Doe 1: It's conflicting eric101#8073: ew no not lee

eric101#8073: that's my dads middle name

eric101#8073: name

i. 1/7/2023 8:30PM

Jane Doe 1: I'm about to take a shower

eric101#8073: can I join? Jane Doe 1: Maybe

eric101#8073: on vc?

Jane Doe 1: You are gonna barely see me if we do vc Jane Doe 1: imm probably gonna hide from the camera eric101#8073: could I watch you undress *emoji*

eric101#8073: please don't hide

Jane Doe 1: O

Jane Doe 1: I'm already about to hop in the actual shower I was already

undressing

eric101#8073: wait cause I wanna see you nakeddddd

Jane Doe 1: No

Jane Doe 1: I'm not ready eric101#8073: aweeee okay

eric101#8073: baby I wanna get in there and eat your pussy

Jane Doe 1: I mean I took these for you

Jane Doe 1: [sends nude picture of herself standing]
Jane Doe 1: Hold on imma take a shower now

21. In the midst of the screen recording, the Discord application shut down. The screen recording shows the Discord application reopen and shows Discord username "eric101#9073" actively change to "Deleted User b1eb0990". 1 The following conversation occurred between Jane Doe 1 and "Deleted User b1eb0990":

¹ From my review of publicly available information provided by Discord, including its Law Enforcement Guide, as well as my training and experience and conversations with other law enforcement officers, I have learned that the term "Deleted User" is not part of the Discord

a. 1/16/2023 2:13PM

Jane Doe 1: Are you just sitting down? Deleted User b1eb0990: laying down

Jane Doe 1: Oh Jane Doe 1: I'm sitting

Deleted User b1eb0990: sit on me while I lay down

Jane Doe 1: 1 Jane Doe 1: Gee

Jane Doe 1: You think you could handle me?

Deleted User b1eb0990: mhmm

Jane Doe 1: Okayy

Jane Doe 1: I move around a lot so I might end up doing a whole 360 on you

Deleted User b1eb0990: hehe okay

Jane Doe 1: Yeaa Jane Doe 1: idk

Jane Doe 1: What to do m Jane Doe 1: 1'm bored

Deleted User b1eb0990: me too Jane Doe 1: Pff if only you could call Deleted User b1eb0990: I knowwww

Jane Doe 1: Why can't you

Jane Doe 1: *emoji*

Jane Doe 1: DO NOT OPEN THIS IF YOU ARE NEAR YOUR DAD

Jane Doe 1: [sends video of herself sitting on the floor nude while fondling and digitally penetrating her vagina]

Jane Doe 1: I just thought since you let me see you do it could return the favor Deleted User b1eb0990: FUCKKKKK* MY COCK IS SO FUCKING HARD

Deleted User b1eb0990: I FOLDDDDD*

Deleted User b1eb0990: that is absolutely fucking exquisite *emoji*

Jane Doe 1: Yea? *emoji*

Deleted User b1eb0990: MOMMY I WANNA EAT YOUR PUSSYYYYYYYYY

Deleted User b1eb0990: lemme eat ittttt *emoji*

Jane Doe 1: Okayyy

Deleted User b1eb0990: mmm mommy I wanna eat your cummmmm

Deleted User b1eb0990: cum on meeee

Jane Doe 1: Pffffff yk I wish

Jane Doe 1: But I just got out the shower

Deleted User b1eb0990: proof? Deleted User b1eb0990: lemme see Deleted User b1eb0990: please

account username, but instead denotes that this account has been deleted by the user. Discord, however, maintains records associated with the deleted account until all communications with that account have been closed.

Deleted User b1eb0990: my dads in the shower

Deleted User b1eb0990: lemme vc and rub that pussy for me

Deleted User b1eb0990: pleaseeee
Deleted User b1eb0990: please mommy

Jane Doe 1: [sends selfie of face and top of chest]

Deleted User b1cb0990: ughhh ill mute mommy please

Deleted User b1eb0990: pretty please mommy

Jane Doe 1: No I gotta get out I've been in the bathroom for 2 hours

Deleted User b1eb0990: please just rub a lil my pp hard and I wanna show

you

Jane Doe 1: *I* Jane Doe 1: *Idk*

Deleted User b1eb0990: please mommy

Deleted User b1eb0990: please I really wanna Deleted User b1eb0990: I know you like my pp Deleted User b1eb0990: I gotta be real quick

Deleted User b1eb0990: my dads quick in the shower

Jane Doe 1: Oh Jane Doe 1: No

Deleted User b1eb0990: so please Deleted User b1eb0990: aw okay

Jane Doe 1: I'm sorry

Deleted User b1eb0990: mommy...?

Deleted User b1eb0990: can I fill your pussy with my cum

Jane Doe 1: Yeah

Deleted User b1eb0990: no condom on

Deleted User b1eb0990: just fill it till its pouring out of you

Deleted User b1eb0990: can you do a quick vid of you naked arching?

Jane Doe 1: I think

Jane Doe 1: If the bathroom is big enough
Deleted User b1eb0990: mmmm from the back?
Deleted User b1eb0990: I will cum so fucking hard

Jane Doe 1: Ah

Deleted User b1cb0990: mmm please mommy lemme see that pussy from the back so I know what imma fill with cum

Jane Doe 1: My mom's bathroom is so mf small

Jane Doe 1: [sends video of herself nude on all fours with her vagina exposed from behind]

Jane Doe 1: *emoji* I had to move things around

Deleted User b1eb0990: FUCK YESSSS* IM GONNA FUCKKKKKK

YOUUUUUU* YOURE GETTING PREGNANT

Jane Doe 1: Is that that good?? Woah

Deleted User b1eb0990: I meannn would you do more

Jane Doe 1: How

Deleted User b1eb0990: same way but rock back and forth maybe rub your pussy in that position

Deleted User b1eb0990: finger a lil if you want

Deleted User b1eb0990: if you need to finish up and cant I understand baby you've done so fucking much hehe and im so lucky to have you

- 22. On February 2, 2023, Jane Doe 1 was forensically interviewed by an FBI Child Adolescent Forensic Interviewer (CAFI). Jane Doe 1 confirmed the individual she was chatting with on Discord was "eric101#8073." Jane Doe 1 had a couple of video calls with "eric101#8073" and could only see half of his face during the video calls. Jane Doe 1 described "eric101#8073" as a male with a beard. Jane Doe 1 also described a lamp and a dark brown futon or bed in the background of the video calls.
- 23. According to Department of Motor Vehicles (DMV) records, to include DMV photographs, DMV records revealed DONOVAN CHAPLIN had a beard at the time the photograph was taken. DMV records revealed Christopher L. Chaplin did not have facial hair at the time the photograph was taken.
- 24. According to the New York State Division of Criminal Justice Services Sex Offender Registry, DONOVAN CHAPLIN resided at *** Monroe Avenue, Angola, New York. DONOVAN CHAPLIN'S sex offender registry photograph revealed DONOVAN CHAPLIN with a goatee, taken April 11, 2022.
- 25. On May 23, 2023, a utilities query indicated National Fuel Gas was the utility provider for *** Monroe Avenue, Angola, New York 14006 registered to Christopher Chaplin, telephone number 716-***-3754.
- 26. On May 30, 2023, FBI Buffalo observed an individual matching the description of DONOVAN CHAPLIN exit a sedan bearing New York license plate JLY5195 at *** Monroe

Avenue, Angola, New York 14006. DMV records reveal New York license plate JLY5195 is a 2013 black Hyundai sedan registered to C L Chaplin, Date of Birth: ##/##/1959, address: ** Monroe Avenue, Angola, New York 14006.

- 27. On June 27, 2023, your affiant obtained a federal search warrant from the Honorable Jeremiah J. McCarthy in the Western District of New York for the residence located at 700 Monroe Avenue, Angola, New York 14006 and for the person of DONOVAN CHAPLIN. Upon execution on June 29, 2023, multiple items of electronic evidence were seized and DONOVAN CHAPLIN consented to an interview.
- 28. DONOVAN CHAPLIN was told he was not under arrest and was advised of his *Miranda Rights* and stated the following:
 - a. DONOVAN CHAPLIN initially denied knowledge of Discord username
 "eric101#8073" and any conversations with Jane Doe 1.
 - b. DONOVAN CHAPLIN informed Agents he only accessed the internet with his father, C.C., present to look for jobs or research about sports. C.C. would control the computer while CHAPLIN sat beside him.
 - c. Agents spoke with C.C. and informed him of the information agents had regarding Discord username "eric101#8073" and the subscriber information associated with said account. Agents presented snippets of the chats between Discord username "eric101#8073" and Jane Doe 1 which referenced the Discord user's father's middle name. C.C. confirmed with agents that this Discord user was using C.C.'s true middle name. C.C. asked Agents if CHAPLIN told agents the truth after presenting him with that

- specific chat snippet. Agents informed C.C. that CHAPLIN did not admit to being the user of Discord username "eric101#8073". Agents asked C.C. to call them if CHAPLIN decided he wanted to talk to agents and provide agents with additional information.
- d. After agents departed CHAPLIN and C.C.'s residence, C.C. called your affiant and informed her CHAPLIN was ready to speak with agents and tell them the truth.
- e. FBI Buffalo agents spoke with CHAPLIN and received a written statement containing the following information:
 - CHAPLIN created a Discord account "eric101" using his father's phone number shortly after being released from jail.
 - ii. While using Discord, CHAPLIN communicated with Jane Doe 1, whom he believed to be approximately 15 or 16 years old.
 - iii. CHAPLIN engaged in highly sexual chats with Jane Doe 1 and knew it was wrong because she was not of legal age. CHAPLIN did it because he was horny and wanted to live life on the edge.
 - iv. Jane Doe 1 sent CHAPLIN pictures of her vagina, which he masturbated to.
 - v. CHAPLIN confirmed the Discord chat snippets agents had shown him were of his chats with Jane Doe 1.

CONCLUSION

29. Based upon the facts set forth above, I submit that probable cause exists to believe that DONOVAN CHAPLIN, within the Eastern District of Virginia and elsewhere, between on or about November 12, 2022 and on or about January 25, 2023 has violated Title 18, United States Code, § 2422(b) and 2251(a).

FURTHER YOUR AFFIANT SAYETH NOT.

Desirae E. Maldonado

Special Agent

FBI Child Exploitation Task Force

Federal Bureau of Investigation

Subscribed and sworn before me this 3rd day of July 2023, in the City of Norfolk, Virginia.

AWRENCE R. LEONARD

UNITÉD STATES MAGISTRATE JUDGE